

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	)	
CATHERINE GAUJACQ	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:05CV0969 (JGP)
	)	
ELECTRICITÉ DE FRANCE	)	
INTERNATIONAL NORTH AMERICA,	)	
INC., et al.	)	
	)	
Defendants.	)	
_____	)	

DEFENDANTS’ MOTION TO COMPEL PRODUCTION OF DOCUMENTS

This motion is brought by all Defendants, Electricité de France, S.A. (“EDF”), Electricité de France International North America, Inc. (“EDFINA”), and Christian Nadal (“Nadal”), by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 37(a), to compel full and complete discovery from Plaintiff and to obtain relief for Plaintiff’s failure to make timely discovery. This motion is necessary because Plaintiff has refused to produce documents in response to proper requests.

Defendants ask the Court to: (1) overrule Plaintiff’s unfounded objections to individual document requests and require full production of responsive documents; (2) permit reasonable follow-on depositions by Defendants as necessary in light of late-produced documents; and (3) award Defendants all reasonable expenses, including attorneys’ fees, associated with this motion. The grounds for this motion are more fully described in the accompanying supporting Memorandum. A proposed Order has been submitted.

Dated: June 16, 2006

Respectfully submitted,

/s/

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/s/

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7(m), counsel for Defendants have made good faith attempts to confer with Plaintiff to resolve the issues relating to Plaintiff's failure to respond to individual document production requests. These efforts have included a letter to Plaintiff's counsel sent by email on May 30, 2006, as well as a telephonic meet and confer conference among all counsel on June 5, 2006. The positions of Plaintiff's counsel adopted during the telephone conference and in a follow up email of June 8, 2006 leave the parties at impasse on the issues addressed in the instant motion, and Plaintiff has made clear that she opposes the discovery sought by this motion.

Dated: June 16, 2006

/s/
Morgan D. Hodgson